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Paul Krupa Тиелештет

District No. 1 - PCD, MEBANSSION Political Action Fund

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A Separate Segregated Fund of District No. 1-PCD, MEBA (AFL-CIO)

444 North Capitol Street, NW, Suite 800 Washington, DC 20001-1570 (202) 638-5355 Pacsimile (202) 638-5369

December 9, 1996

Andrew J. Dodson Senior Reports Analyst Reports Analysis Division Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

VIA REGULAR MAIL

Dear Mr. Dodson:

Enclosed please find my letter to you dated November 26, 1996. Per our telephone conversation, please refer to paragraph #3 of the enclosed letter.

If you have any questions, please feel free to contact me.

Very truly yours,

ssistant Treasurer

Enclosure



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Paul Krupa Tressurer

District No. 1 – PCD, MEBA Political Action Fund

A Separate Segregated Fund of District No. 1-PCD, MEBA (AFL-CIO)

444 North Capitol Street, NW, Suite 800 Washington, DC 20001-1570 (202) 638-5355 Facsimile (202) 638-5369

November 26,1996

Andrew J. Dodson Schior Reports Analyst Reports Analysis Division Pederal Election Commission 999 E Street, NW Washington, DC 20463

Dear Mr. Dodson:

This will acknowledge your letter of November 6,1996 and my subsequent phone call to you this morning with respect to the issues raised in your communication.

I have enclosed the amended monthly Report of Receipts and Disbursements for the month of August 1996, which corrects Line 17 and Line 18 of the detailed Summary Page and the respective itemization of each on Schedule A.

With respect to the clarification of all expenditures made for the Committee's participation in the Labor Day Salute. This will advise you that there were no expenditures made on behalf of any Federal Candidates. The disbursement can best be identified by the solicitation which the Committee received, a copy of which is enclosed for your reference.

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Joyce Mt Otto, Assistant Treasurer

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 27, 1996

Paul Krupa, Treasurer
District No. 1-PCD MEBA Political
Action Fund (MEBA-PAF)
444 North Capitol Street NW, Suite 800
Washington, DC 20001

Identification Number:

C00279380

Reference:

September Monthly Report (8/1/96-8/31/96)

Dear Mr. Krupa:

On November 6, 1996 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your November 26, 1996 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

Please clarify all expenditures made for Maritime Participation Labor Day Salute on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or E supporting Line 23 or 24 and include the amount, name, address and office sought by each candidate. If CFR §104.3(b) Your response did not clarify whether your promotional announcements were generic in nature or specifically identified federal candidates.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Andrew Dodson on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20163

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Paul Krupa, Treasurer
District No 1-PCD MEBA Political
Action Fund (MEBA-PAF)
444 North Capitol Street NW, Ste. 800
Washington, DC 20001

Identification Number: C00279380

Reference: September Monthly Report (8/1/96-8/31/96)

Dear Mr. Krupa:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 17 of the Detailed Summary Page discloses receipts for dividends and interest during the reporting period. If this figure includes any receipts from a single source, that aggregate greater than \$200 in the calendar year, please amend your report(s) by itemizing the receipts on Schedule A. 2 U.S.C. \$434(b)(2)(J)

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. \$434(b)(3)(D)

-Please clarify all expenditures made for Maritime participation Labor Day Salute on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or E supporting Line 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR \$104.3(b)

-Line 18 of the Detailed Summary Page of your report discloses a total of \$80,000 in transfers from your non-federal account for joint activity. However, your committee does not appear to have ever paid for joint allocable expenses from your federal account. Please clarify this discrepancy. If your committee has received a transfer from your non-federal account for any purpose other than the payment of joint allocable expenses, be advised that such a transfer is prohibited by 11 CFR \$102.5(a)(1)(i) and the full amount of the transfer(s)

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should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

A written response or an amendment to your original report(8) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Andrew J. Dodson

Senior Reports Analyst Reports Analysis Division

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

FOR INCOMING DOCUMENTS		
The Commission has added this page to the end of this filing to indicate how it was received.		
	Hand Delivered	DATE OF RECEIPT
	First Class Mail	-POSTMARKED
	Registered/Certified Mail	POSTMARKED .
	No Postmark	· · · · · · · · · · · · · · · · · · ·
	Postmark Illegible	
	Received from the House Office of Records and Registration	DATE OF RECEIPT
	Received from the Senate Office of Public Records	DATE OF RECEIPT
	Other (Specify):	POSTMARKED
		and/or DATE OF RECEIPT
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PREPARER		DATE PREPARED